

DATE: 8/30/2015
TO: L A County Airport Land Use Commission
FROM: Jim Gates, VP, Torrance Airport Association (TAA)
Subject: Project # R2015-03166-(4) / Aviation Case # 201500005
South Bay Lexus Torrance, 8/31/2015, Item 4

The Torrance Airport is a valuable and irreplaceable transportation, education, recreation, and disaster relief/recovery asset for the entire South Bay area. TAA's mission is to assure the safe and proper management of that asset on behalf of all of the residents in the South Bay, including the aviation community.

We acknowledge that the re-planning effort, if executed in accordance with the stated restrictions, may decrease the danger to persons on the ground--a major purpose of an RPZ. The elimination of the lighting standards may also reduce the distraction to pilots using our instrument landing system in bad weather.

However, TAA still has serious safety concerns about this development:

1. The RPZ has another purpose: to provide an obstacle-free area for aircraft which might land short of the threshold or overrun the end of the runway on an aborted takeoff. I refer you to the **California Airport Land Use Planning Handbook, Section 4.4.5: Minimizing Injury to Aircraft Occupants**. The guidelines suggested for RPZs is to *"Maintain all undeveloped land clear of objects in accordance with FAA standards."* The introduction of up to 332 4,000 lb automobiles into the RPZ poses a real survival hazard to aircraft occupants in these emergencies.
2. This encroachment in the RPZ is unnecessary. Other dealers have found sufficient off-site storage elsewhere in Torrance near Crenshaw and Del Amo. There is sufficient space behind the current building for automobile storage. Like Longo Lexus, this dealer could add a multi-story structure on existing property.
3. If approved, this "storage lot" in the RPZ could overnight become a sales lot by simply opening the fence to the rest of the dealership. What would prevent this scenario?
4. The amount of light directed or reflected upward from the six display pads is unknown. The effects of this diffused light on the pilots' ability to safely make instrument landings in bad weather is still unknown.
5. This may be the first of many requests to build "storage lots" in the RPZ by this and/or other auto dealers nearby--adding to the obstacles in the RPZ. What prevents others from using this as a precedent?

TAA realizes that the ALUC authority over these developments is limited to noise and safety issues. We are opposed to any development on or around the Torrance Airport that would decrease the safety and utility of this valuable and irreplaceable asset. We urge you to find that this development in the RPZ is INCOMPATIBLE with the ALUP and that it poses serious safety hazards to aircraft occupants.